



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

TH/MKP/MJL/KMT
F. #2017R01840

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 13, 2019

By Hand and ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.
Criminal Docket No. 18-204 (NGG)

Dear Judge Garaufis:

The government respectfully submits this letter to advise the Court that the Grand Jury today returned a second superseding indictment in this case (“S-2,” attached hereto as Exhibit A), and to outline for the Court the manner in which S-2 differs from the first superseding indictment (“S-1”).

1. The defendant Nancy Salzman, who has pleaded guilty, has been removed and is not referenced in S-2.
2. Defendants Keith Raniere, Clare Bronfman, Allison Mack, Kathy Russell and Lauren Salzman have been charged with racketeering conspiracy. Defendants Raniere, Bronfman, Mack and Salzman have been charged with racketeering.
3. Four additional predicate racketeering acts (“RAs”) have been alleged: two racketeering acts alleging sexual exploitation of a child, in violation of 18 U.S.C. § 2251(a) (RAs 2 and 3); one racketeering act alleging possession of child pornography, in violation of 18 U.S.C. § 2252(a) (RA 4); and one racketeering act alleging visa fraud, in violation of 18 U.S.C. § 1546 (RA 11). Three additional counts have been added: two counts charging sexual exploitation of a child (Counts Three and Four) and one count charging possession of child pornography (Count Five).

4. The removal of former RA 5A, which alleged encouraging and inducing illegal entry (but maintaining the other subpredicate of that racketeering act, now charged in RA 8).
5. The removal of former RAs 8C and 9C, which originally alleged state law extortion of Jane Does 5 and 6 (but maintaining the other subpredicates of those racketeering acts, now alleged as RAs 12 and 13).
6. The wording of certain allegations has been amended.

In light of the additional charges in S-2, the government respectfully requests that the current deadlines for proposed jury questionnaires and motions in limine, currently scheduled for March 18, 2019, be postponed and rescheduled at the next status conference.

Respectfully submitted,

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cc: Clerk of Court (NGG) (by ECF)
Counsel of Record (by ECF)